

## REMARKS

This is intended as a full and complete response to the Final Office Action dated November 2, 2006, having a shortened statutory period for response set to expire on February 2, 2007. Applicants submit this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

Claims 9, 11 – 18 and 25 are pending in the application. Claims 9, 11 – 18 and 25 remain pending following entry of this response. Claims 9 and 25 have been amended. Applicants submit that the amendments do not introduce new matter.

### Claim Rejections - 35 U.S.C. § 103

Claims 9, 11-18 and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over US 2004/0205545, (hereinafter, "*Bar*") in view of U.S. 6,519,603 (hereinafter, "*Bays*") and in further view of US 5,537,526 (hereinafter, "*Anderson*"), and in further view of US 5,253,362 (*Nolan*).

Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. See MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 2143. The present rejection fails to establish at least the third criteria.

With respect to the third criteria, the references either alone or when combined fail to teach at least an annotation browser *configured to display, to the user, annotations and links to associated annotated data objects wherein selecting the links*

*to the associated data objects, by the user, causes an application used to manipulate the associated data objects to be invoked, as recited in independent claims 9 and 25.*

The Examiner argues that *Anderson* discloses an annotation browser configured in this manner. The system disclosed in *Anderson* may use links to associate an annotation with parts of a document to which an annotation refers. These links are not displayed to a user, however, as recited in claims 9 and 25 (see column 4, lines 15-16; figure 2, item 204; & column 5, lines 11-12). Further, because these links are not displayed to a user, there is no teaching of selecting a link, by the user, and certainly no teaching of invoking an application used to manipulate the associated data objects in response to selecting the links.

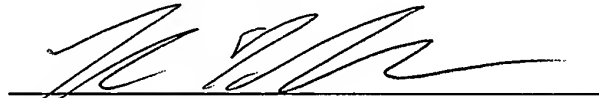
Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Conclusion

Having addressed all issues set out in the final office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

If the Examiner believes any issues remain that prevent this application from going to issue, the Examiner is strongly encouraged to contact Gero McClellan, attorney of record, at (336) 643-3065, to discuss strategies for moving prosecution forward toward allowance.

Respectfully submitted,



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Randol W. Read  
Registration No. 43,876  
PATTERSON & SHERIDAN, L.L.P.  
3040 Post Oak Blvd. Suite 1500  
Houston, TX 77056  
Telephone: (713) 623-4844  
Facsimile: (713) 623-4846  
Attorney for Applicants